

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

REENA S. MATHEW,  
Plaintiff

v.

SANTANDER CONSUMER USA INC.,  
Defendant

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Civil Action No. 3:23-cv-01494-N

**RESPONSE TO DEFENDANT’S EMERGENCY  
MOTION FOR SETTLEMENT CONFERENCE**

The parties agreed not to mediate, but that does not mean the parties cannot discuss settlement. Plaintiff made a settlement demand on August 12, 2024, and Defendant never responded. Defendant now claims this amounts to an emergency.

Putting that aside, Plaintiff has decided that if this is what it takes to have a settlement discussion, she will listen. Plaintiff therefore withdraws her opposition to the motion, on one condition. Should the Court decide to order a settlement conference, Plaintiff asks the Court to order Defendant to respond to Plaintiff’s last settlement offer at least 24 hours before the conference.

Plaintiff also submits that would be better if the Court let another Judge or Magistrate Judge handle the settlement conference.

Respectfully submitted,

/s/ Donald E. Uloth  
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on February 13, 2025 I am filing this motion electronically using the Court's ECF filing system, which will email a file-marked copy of this motion to all counsel of record.

/s/ Donald E. Uloth  
Donald E. Uloth